

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>IN RE:</b> <b>ALYSSA N JANVRIN</b>    <b>Debtor</b>	) ) ) ) ) ) )	<b>CASE NO: 23-40934</b> <b>Chapter 13</b>  <b>Trustee's Objection to Confirmation</b> <b>Original Confirmation Hearing set for :</b> <b>May 11, 2023 11:00 am</b>
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**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. The plan fails to pay the full attorney fee owed per the 2016(b) form.
2. The Debtor has not filed 2019, 2021, 2022 pre-petition tax returns. 11 U.S.C. § 1325(a)(9).
3. Although Debtor testified that she is not on the deed for the house in which she resides, the Jefferson County Assessor website shows that Debtor is on the deed. The schedules should be amended to disclose this asset and debt, and the plan should be amended to properly address the debt.
4. Schedule J shows that Debtor's household expenses are equal to income such that Debtor does not have any disposable income with which to make the Chapter 13 plan payment.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: May 08, 2023

OBJCONF--JMP

/s/ Jennifer M. Pontus

Jennifer M. Pontus MO65660

Attorney for Trustee

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on May 08, 2023, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on May 08, 2023.

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/s/ Jennifer M. Pontus

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